

**THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NEW REFLECTIONS PLASTIC  
SURGERY, LLC

Plaintiff,

vs.

REFLECTIONS CENTER FOR SKIN  
AND BODY, PC,

Defendant.

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Civil Action No. 3:16-cv-08523-FLW-TJB

JURY TRIAL DEMANDED

**DECLARATION OF ANYA S. ENGEL**

I, Anya S. Engel, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a law clerk of Meredith & Keyhani, PLLC, attorneys for Plaintiff New Reflections Plastic Surgery, LLC in the above captioned case. I am over 21 years of age. I have personal knowledge of the following facts or access to information allowing me to confirm these facts.

2. Attached as Exhibit A are true and correct images of the interior and exterior of Defendant's offices taken from Defendant's website, Google maps, and Defendant's Martinsville NJ Yelp webpage: <https://www.yelp.com/biz/reflections-center-for-skin-and-body-martinsville-martinsville>, last visited on June 10, 2018.

3. Attached as Exhibit B are true and correct screenshots from Defendant's social media accounts and Defendant's Martinsville NJ Yelp webpage.

4. Attached as Exhibit C is a true and correct copy of Defendant's USPTO Trademark/Service Mark Application for "Reflections center for skin and body," serial number 77585652, filed on October 4, 2008.

5. Attached as Exhibit D is a true and correct copy of a press release available at least as early as June 23, 2000 on Brandywine's website for Reflections, Brandywine's memory care program. This documents is available with date stamp from the Wayback machine, a 501(c)(3) non-profit, digital library of Internet sites.

6. Attached as Exhibit E is a true and correct copy of excerpts from <http://www.brandycare.com/our-programs/reflections/>, last visited on June 11, 2018.

7. Attached as Exhibit F is a true and correct copy of excerpts from Defendant's website, last visited on June 11, 2018.

8. Attached as Exhibit G is a true and correct copy of instructions and application to register a State trade or service mark, issued by the New Jersey Department of the Treasury and available at <http://www.state.nj.us/treasury/revenue/dcr/pdforms/tmsm01.pdf>, last visited June 11, 2018.

9. Attached as Exhibit H is a true and correct copy of an email Maria Carnevale, director of community relations at Brandywine's Reflections program, sent me on June 11, 2018.

10. Attached as Exhibit I is a true and correct copy of excerpts of the transcript of the deposition of Mitchell Chasin, M.D. (November 2, 2017).

s/Any S. Engel  
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